

O'MELVENY & MYERS LLP

Daniel M. Petrocelli, CA Bar No. 97802*

dpetrocelli@omm.com

David Marroso, CA Bar No. 211655*

dmarroso@omm.com

Joseph Guzman, CA Bar No. 310493*

jguzman@omm.com

1999 Avenue of the Stars, 8th Floor

Los Angeles, CA 90067

Phone 310 553-6700

Fax 310 246-6779

*Admitted pro hac vice

HONE LAW

Eric D. Hone, NV Bar No. 8499

ehone@hone.law

Jamie L. Zimmerman, NV Bar No. 11749

jzimmerman@hone.law

701 N. Green Valley Parkway, Suite 200

Henderson, NV 89074

Phone 702-608-3720

Fax 702-703-1063

Attorneys for Defendant Top Rank, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TERENCE CRAWFORD, an individual,

Plaintiff,

vs.

TOP RANK, INC., a Nevada corporation; and
Does 1 through 20, inclusive,

Defendants.

Case No. 2:22-cv-00081-APG-EJY

**JOINT STATUS REPORT CONCERNING
REMOVAL**

Plaintiff Terence Crawford ("Crawford") and Defendant Top Rank, Inc. ("Top Rank") (collectively referred to as the "Parties"), by and through their undersigned counsel, respectfully submit this Joint Status Report Concerning Removal pursuant to the Court's January 18, 2022 Minutes of the Court [ECF No. 4].

1. Top Rank filed a Petition of Removal on January 15, 2022 [ECF No. 1].

2. On January 18, 2022, the Court entered Minutes of the Court [ECF No. 4]

requiring Top Rank to file a statement regarding removal and serve the Minutes of the Court on



1 all parties within 15 days, as well as requiring the parties to file a status report concerning
2 removal within 30 days.

3 3. On February 2, 2022, Top Rank filed its Statement Regarding Removal [ECF No.
4 14].

5 4. Also on February 2, 2022, Top Rank filed a Certificate of Service for Minutes of
6 the Court [ECF No. 13].

7 5. On February 11, 2022, the Parties filed a Stipulation and [Proposed] Order to
8 Extend the Time for Top Rank, Inc. to Respond to Complaint, File Counterclaims, File Motions
9 Pursuant to Federal Rule of Civil Procedure 12, and File Any Special Motions to Dismiss
10 Pursuant to Nevada's Anti-SLAPP Statute (the "Stipulation") [ECF No. 19.]

11 6. The Court entered its Order granting the Stipulation (the "Stipulation and Order")
12 [ECF No. 20] on February 11, 2022.

13 7. On February 14, 2022, Crawford filed a Motion for Remand [ECF No. 21]. Top
14 Rank's response is due by February 28, 2022, and Crawford's reply is due by March 7, 2022.

15 8. Pursuant to the Stipulation and Order, Top Rank's deadline to respond to
16 Crawford's complaint, file counterclaims, file motions pursuant to Federal Rule of Civil
17 Procedure 12, and to file any special motions to dismiss pursuant to Nevada's Anti-SLAPP
18 Statute are extended to 14 days after entry of an order by the Court concerning the Motion to
19 Remand. *See* ECF No. 20, p. 3.

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1 9. The parties respectfully submit that no further action is required by the Court until
2 briefing on the Motion to Remand is completed.

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4 Dated this 17th day of February 2022.

Dated this 17th day of February 2022.

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6 /s/ Hector J. Carbajal II

FREEDMAN + TAITELMAN, LLP

7 Bryan J. Freedman, Esq., CA Bar No. 151990*

BFreedman@ftllp.com

8 Brian E. Turnauer, Esq., CA Bar No. 214768*

BTurnauer@ftllp.com

9 1801 Century Park West, 5th Floor

Los Angeles, CA 90067

10 Phone 310-201-0005

*Admitted pro hac vice

11 CARBAJAL LAW

12 Hector J. Carbajal II, NV Bar No. 6247

hector@claw.vegas

13 10001 Park Run Drive

Las Vegas, Nevada 89145

14 Phone 702-846-0040

15 *Attorneys for Plaintiff Terence Crawford*

/s/ Jamie L. Zimmerman

O'MELVENY & MYERS LLP

Daniel M. Petrocelli, CA Bar No. 97802*

dpetrocelli@omm.com

David Marroso, CA Bar No. 211655*

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Joseph Guzman, CA Bar No. 310493*

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